

ANTI-SLAVERY POLICY

OVERVIEW

Modern slavery is a hidden problem and a devastating reality for men, women and children in countries globally, including highly developed countries. Whilst Modern Slavery is a crime under Australian law, incidents of modern slavery have been identified as occurring in Australia as well as in the supply chains of Australian businesses.

Modern slavery is an umbrella term for a number of serious exploitative work practices that can include any situations of severe mistreatment or deceptive recruiting for labour or services where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception.

ZERO-TOLERANCE APPROACH

Corval Group and its related entities (together, the '**Company**') has a long-standing commitment to corporate responsibility. Modern slavery practices are major violations of human rights and serious crimes and will not be tolerated in our operations.

We are committed to working within our own entities and with our suppliers and stakeholders to assess potential areas of risk, to ensure transparency and to take necessary measures for the prevention of any forms of slavery or human rights offences across our operations and supply chain.

The Company's Anti-Slavery Policy (**Policy**) applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants, suppliers and any other third-party representatives and their associated operations.

The Company expects all who have, or who are seeking to have, a business relationship with the Company, including those aforementioned, to familiarise themselves with this Policy and to act in a way that is consistent with its intent.

This Policy will be used to support any statements or disclosure the Company makes in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* in relation to its operations and supply chains.

LABOUR

Corval Group entities and suppliers must ensure that all employees are engaged voluntarily and that they have freedom of association and are paid – at the very least – applicable minimum award wages.

Corval Group entities and suppliers must comply with terms in relation to labour and human rights as stipulated in the Company's **Ethical Trade Standards**, including the Company's zero tolerance for:

- Any type of modern slavery, including child and forced labour
- Underpayment of wages
- Worker-paid recruitment fees
- Workplaces that are deficient in health & safety levels
- Workplaces that are discriminatory

SUPPLIER RISK ASSESSMENT & DUE DILIGENCE PROCESS

With significant reliance on the supply of goods from a wide range of suppliers based in multiple geographical locations, the Company conducts ongoing, collaborative risk assessments with supply partners across our supply chain to determine which parts of the business are most at risk of modern slavery and to assess whether suppliers are meeting the Company's standards. To this effect:

- the Company will engage directly with new or existing suppliers to gain a full understanding of the measures the supplier has in place to confirm that no act of modern slavery is occurring within that business.
- supply partners may be required to provide third party validated documentation confirming that their operations comply with this Policy and Australian regulatory standards.
- where the Company identifies concerns about supplier performance, we will engage with the supplier and seek constructive dialogue and remediation of noncompliance with our standards.
- if gross violations are identified, the Company will immediately initiate action to remove the supplier from the supply chain and cease business dealings, except where the supplier can provide evidence of immediate, verifiable steps towards compliance.
- all suppliers will be issued a communication outlining new or amended legislative requirements in relation to modern slavery along with a copy of this Policy with a mandate to adhere to the standards and terms set out.
- all new contractual documentations will include a clause that:
 - incorporates specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, or the use of child labour in line with this Policy;
 - makes provision for our suppliers to hold their own suppliers to the same standards; and
 - provides for the termination or suspension of business relationships with suppliers in the event of breaches of this Policy.

Further to working closely with our suppliers to conduct risk assessments and action any outcomes, the Company undertakes to:

- establish a corrective action process and set clear KPIs to monitor the effectiveness of the steps taken to ensure that modern slavery is not taking place in our business operations or supply chains;
- immediately carry out or enforce corrective measures if modern slavery is identified as present in any form whatsoever within the business organisations or supply chain;
- issue communications to staff and suppliers on modern slavery risks and impacts; and
- make publicly available the Company's Anti-Slavery Policy in line with our commitment to transparency and in accordance with the *Modern Slavery Act 2018 (Cth)*.

GRIEVANCE & COMPLAINT (WHISTLEBLOWER POLICY)

Corval Group entities undertake to have a Grievance & Complaint process in place that allow their workers, their suppliers and other stakeholders anonymously and confidentially report a suspected concern regarding human rights or other major grievances, such as fraud, illegal or unethical business practices, breaches of legislation and criminal behaviour.

Corval Group entities undertake to regularly inform their employees and stakeholders of how such reports are able to be made.

Corval Group intends to work only with suppliers that have an equivalent Grievance & Complaint structure and process in place. Where an audit or enquiry suggests otherwise, Corval Group entities will work to address this with the supplier, or seek an alternative supplier.

RESPONSIBILITY FOR THIS POLICY

The Finance, Audit & Risk Committee has overall responsibility for this Policy and in ensuring that the Company complies with all its legal and ethical obligations. The People and Culture Team in liaison with Supply Chain Management will have the primary day-to-day responsibility for the implementation of this Policy, monitoring its use and ensuring that the appropriate processes and control systems are in place and amended as appropriate, to ensure it can operate effectively.

Communication to all employees will be conducted by the respective department managers who will ensure that relevant colleagues receive adequate information and instruction regarding this Policy and any supporting processes applicable to their role.

BREACHES OF THIS POLICY

Any employee or person working for or on behalf of the Company who breaches this Policy by engaging in or conspires to engage in any modern slavery conduct will face disciplinary action. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal and if warranted legal proceedings may be brought against the person in breach. The Company may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this Policy.

If any part of this Policy is unclear, clarification should be sought from the People and Culture Team.

STATUS OF THIS POLICY

This Anti-Slavery Policy reflects the Company's current practice. The Policy will be reviewed on a regular basis and may be updated from time to time to reflect legal, operational and other requirements.